

EXHIBIT 1

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**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA**

GOOGLE LLC,

Plaintiff,

v.

SONOS, INC.,

Defendant.

Case No. 3:20-cv-6754

**SONOS, INC.'S DISCLOSURE OF
ASSERTED CLAIMS AND
INFRINGEMENT CONTENTIONS**

Honorable William Alsup

1 discovery responses from Google, Sonos's inspection of Google's source code is ongoing. Given
 2 that fact discovery is in its infancy and Google served its (deficient) discovery responses on
 3 September 7, 2021 and has refused to engage with Sonos about when it will adequately
 4 supplement its responses, Sonos has not had an opportunity to confer with Google on these
 5 responses or approach the Court for intervention, if necessary.

6 For at least these reasons, Sonos specifically reserves the right to further amend, revise
 7 and/or supplement these contentions and/or accompanying exhibits in accordance with any
 8 Orders of record in this matter, Patent L.R. 3-6, and Federal Rule of Civil Procedure 26(e), as
 9 additional documents and information become available and as discovery and investigation
 10 proceed. Sonos also reserves the right to supplement, modify or amend these contentions to
 11 include additional products or services made, used, sold, or offered for sale in or imported into the
 12 United States by Google.

13 The information in these contentions is not an admission regarding the scope of any
 14 claims or the proper construction of those claims or any terms contained therein. Google has not
 15 indicated whether it intends to advance in this case any construction of any claim pursuant to L.R.
 16 4-2. In the event Google advances any constructions under L.R. 4-2 pursuant to the Court's Case
 17 Management Scheduling Order (Dkt. 67), Sonos reserves the right to revise or supplement these
 18 contentions to address such a construction. *See* Dkt. 67, ¶ 17.

19 **I. Disclosure of Asserted Claims & Infringement Contentions**

20 **A. Identification of Accused Instrumentalities Pursuant to Patent L.R. 3-1(b)**

21 Based on the information currently in its possession, Sonos contends that the Asserted
 22 Patents are infringed by Google via, either individually or in combination, the following products
 23 (individually, "**Accused Instrumentality**" or collectively, "**Accused Instrumentalities**"):

24 '615 and '033 Patents: (a) Smartphone, tablet, and computer devices, including Google's
 25 own "Pixel" smartphone, tablet, and computer devices (e.g., the Pixel, Pixel XL, Pixel 2, Pixel 2
 26 XL, Pixel 3, Pixel 3 XL, Pixel 3a, Pixel 3a XL, Pixel 4, Pixel 4 XL, Pixel 4a, Pixel 4a (5G), Pixel
 27 5, Pixel 5a (5G), Pixel 6, and Pixel 6 Pro phones, the Pixel Slate tablet, and the Pixelbook and
 28 Pixelbook Go laptops), as well as third-party smartphone, tablet, and computer devices, that are

(i) installed with any of Google’s own Cast-enabled Android, iOS, Chrome or browser-based apps that allow a user to transfer playback of streaming media content from the user’s smartphone, tablet, or computer devices to a Cast-enabled media player and then control the Cast-enabled media player’s playback, including but not limited to the YouTube app, YouTube Kids app, YouTube TV app, YouTube Music app, Google Play Music app, and Google Podcasts app accessed via either an app store or ChromeCast-enabled site URL¹ (including youtube.com, music.youtube.com, tv.youtube.com, and spotify.com) and/or (ii) installed with any third-party Cast-enabled app that allows a user to transfer playback of streaming media content from the user’s smartphone, tablet, or computer devices to a Cast-enabled media player and then control the Cast-enabled media player’s playback, including but not limited to the Spotify app² (the foregoing, including Chromecast-enabled websites, are referred to herein either individually or collectively as the “**accused Cast-enabled apps**”); (b) Cast-enabled media players having a display screen and installed with Cast-enabled software (e.g., firmware and/or Cast-enabled apps) that allows a user to transfer playback of streaming media content from the Cast-enabled media player to another Cast-enabled media player and then control the other Cast-enabled media player’s playback, including Google’s Home Hub, Nest Hub, and Nest Hub Max media players (referred to herein as “**Cast-enabled displays**”); (c) Servers that host at least one of the accused Cast-enabled apps for download onto or access by smartphone, tablet, or computer devices; and (d) Cloud-based infrastructure hosting backend software that facilitates the aforementioned Cast functionality for transferring playback of streaming media content to a Cast-enabled media player and/or controlling the Cast-enabled media player’s playback.

’966 Patent: (a) Smartphone, tablet, and computer devices, including Google’s own “Pixel” smartphone, tablet, and computer devices (e.g., the Pixel, Pixel XL, Pixel 2, Pixel 2 XL, Pixel 3, Pixel 3XL, Pixel 3a, Pixel 3a XL, Pixel 4, Pixel 4 XL, Pixel 4a, Pixel 4a (5G), Pixel 5, Pixel 5a (5G), Pixel 6, and Pixel 6 Pro phones, the Pixel Slate tablet, and the Pixelbook and

¹ See, e.g., <https://support.google.com/chromecast/answer/3265953?hl=en>.

² See, e.g., <https://support.google.com/chromecastbuiltin/answer/6279384?hl=en#zippy=%2Cbefore-you-begin-casting%2Ccast-from-chromecast-enabled-apps-to-your-audio-device%2Cfind-new-content-to-cast;https://www.google.com/chromecast/built-in/apps/>.